



Beede Site Newsletter

Volume IV, No. 1 - May 2000

Periodic newsletters have been distributed to individuals interested in the investigation and clean-up of the Beede Waste Oil Superfund Site since removal activities began in 1996. This issue of the newsletter is being distributed more broadly to those parties who may have generated or transported waste to the Beede Site or who may otherwise be interested in current investigation, clean-up and enforcement activities. For a copy of previous newsletters, call the Beede Enforcement Hotline toll-free at 1-888-294-6980 or visit the Beede web site at www.epa.gov/region01/osrr/beede/index.html.

Potentially Responsible Party Search and Enforcement Activities

Potentially Responsible Parties, or "PRPs," include any owner/operator of a site, any generator, or any transporter of hazardous waste to the site. Under the Superfund law, PRPs are responsible for contributing to contamination of the site and may be required to share the burden of performing or financing the cleanup.

Non-Time Critical Removal Activities

Last Fall, EPA contractors began construction of the non-time critical removal action which includes a 24 foot extension to the 100 foot long oil interceptor trench and installation of a vacuum-enhanced extraction (VEE) system.

The extension to the trench is necessary to capture the western edge of the waste oil plume and prevent additional seepage into Kelley Brook. The interceptor trench will work with the VEE system to remove the mobile floating waste oil which is a continuing source of groundwater contamination.

The VEE system consists of 143 shallow extraction wells which are installed a few feet into the water table. Although the focus is on removing oil, while minimizing the removal of groundwater, some groundwater and air are simultaneously extracted. Once extracted, the oil, water and air mixture is sent through an air and fluids separator. The air is sent through a carbon canister to filter out any contaminants prior to discharge to the atmosphere.

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EPA is winding down its search for parties who owned, operated, transported or generated waste to the Beede Waste Oil Site and may be required to contribute to investigation and/or clean-up activities. As the search phase winds down, enforcement activities are picking up. At present, EPA is working to complete PRP and volumetric ranking lists, determine party groupings, and prepare for issuance of General Notice letters which will notify parties formally of their PRP status.

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Below: Shallow extraction wells connected to the VEE system.



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The remaining oil and water mixture is first sent through an oil and water separator and then sent to separate holding tanks for off-site disposal. Individual wells are cycled to maximize system efficiency, and about one third of the 143 wells operate at any one time. Two 50 hp pumps are required to create the necessary vacuum pressure.

The treatment system is housed in two small buildings which protect the system components and minimize noise to nearby residents. The system currently operates during regular business hours only but may operate continuously. A system operator is on Site during regular business hours. Automated monitoring and shutdown safety devices have been incorporated into the system to minimize the potential for spills or other failures should system operation after hours occur.

The system began operation on February 16, 2000 and has recovered over 8,500 gallons. In total, it is anticipated to operate for nine or more months and is expected to recover at least 40,000 gallons of waste oil.

For More Information

BEEDE ENFORCEMENT HOTLINE

617 737-1512 or

1-888-294-6980

fax 1-888-294-6981

BEEDE WEB PAGE

www.epa.gov/region01/osrr/beede/index.html

US EPA

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A BRIEF SITE HISTORY

For a more detailed history, see earlier newsletters.

1926-94

Commercial operations, including recycling of used oil & cold patch manufacturing.

1992

DES files suit in state court to compel investigation and cleanup of the site.

1995

DES conducts site investigations.

1996

Current site owner is sentenced to serve 37 months for illegal & improper handling of hazardous waste.

NH Fish & Game, DES & EPA conduct fish tissue survey.

DES & EPA initiate removal actions to address tanks and drums contamination. Action is completed summer, 1997.

DHHS conducts a Public Health Assessment for the site under cooperative agreement with ATSDR.

The site is added to the Superfund list.

1997

EPA and DES initiate remedial investigation (RI) and an engineering evaluation / cost analysis (EE/CA).

1998

DES performs field work for the remedial investigation. The old building is removed to allow soil sampling.

EPA issues an Action Memorandum selecting vacuum enhanced extraction as the appropriate technology to remove mobile floating oil.

1999

DES & EPA evaluate results of the RI. The human health and ecological risk assessment is underway. The feasibility study begins to review available technologies for cleanup.

Construction of the vacuum enhanced extraction (VEE) system begins.

EPA continues PRP search & completes mailing of more than 7,400 information request letters.

2000

DES & DHHS, prepare the draft human health and ecological risk assessment and the RI report.

EPA begins operation of the VEE system.

EPA prepares to send General Notice to an estimated 3,000 PRPs.

Information Collection: Between the Fall of 1997 and the Spring of 1999, EPA distributed Information Request Letters to more than 7,400 parties to seek information regarding the use, transport or generation of waste to the Beede Site.

The responses to these letters, combined with information from operator records, and state hazardous waste manifests have been logged and assembled into an enforcement file and the file has been scanned and copied to a group of 31 CD ROMs. Although portions of the enforcement file are confidential, much of the file will be made available to the public in the near future.

PRP and Volumetric Lists: The information contained in the enforcement file will be used to create a list which contains all parties who EPA believes are PRPs, namely, owners/operators, transporters or generators of waste to the Site. The PRPs who EPA determines should receive General Notice letters are included on the "PRP List." Of the three main categories of PRPs, the generator group is by far the largest.

In addition to the PRP List, information from the enforcement file is being used by EPA to create a "Volumetric Ranking List." The Ranking List will illustrate the relative contribution of waste by each party and will be based on the total known volumes of waste sent to the Site.

Party Groupings and General Notice: The PRP and Volumetric Ranking lists will form the basis for assigning relative responsibility and categorizing the parties. The majority of generator PRPs likely will fall into two primary groups.

First, PRPs with the greatest volumes will be considered "major" parties and may be asked to assume the financial and technical responsibilities of performing future investigation and clean-up activities at the Site and reimbursing past costs. Second, PRPs with relatively smaller volumes may be considered "de minimis" parties. *De Minimis* parties may be asked to make a proportional cash contribution

to the Site investigation, clean-up and reimbursement of past costs. Those parties who contributed 110 gallons of waste or less are the smallest contributors. Such parties are known as "*de micromis*" and will not be issued General Notice Letters at this time since EPA does not plan to pursue them. In fact, under EPA policy, these parties may seek protection from contribution lawsuits brought (or threatened) by the PRPs at Beede. EPA also will require PRPs who settle with the government to waive their claims against *de micromis* parties.

Approximately 3,000 parties will be named as PRPs at the Beede Site. Note that, under the Superfund law, any single PRP or group of PRPs may be held responsible for financing and performing the entire clean-up at the Site and reimbursing past costs. Also, parties who received information request letters are not necessarily PRPs. Parties are notified of their status as a PRP at the Site though receipt of a General Notice letter. EPA anticipates distribution of General Notice letters this Summer.

For additional information on the PRP search process, please see the articles in our June 1998 and March 1999 Beede Waste Oil Newsletters. For copies of these newsletter articles or for more information about enforcement activities, please call the Beede Enforcement Hotline at 617 737-1512 or toll-free at 1-888-294-6980. Further details on the PRP search process and relative party ranking information is anticipated in the next newsletter to be distributed this Summer (prior to General Notice).

Remedial Investigation & Feasibility Study

Characterizing hazardous waste sites is a complex process and Beede is no exception. The various waste types and source areas at the Site have combined into a complex mixture of PCBs, solvents, metals and other wastes which have severely degraded soil and groundwater quality.

While assessing the impacts of contamination, which has entered Kelley Brook and the surrounding wetlands, wildlife specialists identified a large area of dead vegetation. During the fall of 1999, samples of sediment, native plants and aquatic insects were collected to identify the cause. The results will indicate the extent of appropriate cleanup in Kelley Brook.

DES' consultant, Sanborn, Head & Associates, continues to evaluate the extremely large amount of data which has been collected at the Site since the Fall of 1996.

The result of this effort will be a Remedial Investigation Report (RI Report) which will quantify the nature and extent of contamination present in all media at the Site and explain the human health and ecological risks associated with the contamination. A final RI Report is expected to be released to the public this Summer.

Shortly after, EPA and DES will complete a Feasibility Study which evaluates available technologies to address the wastes and potential risks identified in the RI Report. Appropriate technologies will be assembled into cleanup options and will be compared against several performance criteria. This will be published in a Feasibility Study Report.

EPA and DES will recommend the "preferred" alternative for cleanup of the Site in a Proposed Plan, currently scheduled for late Fall or Winter. The public will have an opportunity to comment on the cleanup options before a final decision is made.

Based on a zoning change supported by the community and implemented by the Town of Plaistow in 1996, EPA and DES will propose that the Site be cleaned up to meet residential standards. This is the highest level of cleanup possible.



Above: Sampling of aquatic insects to measure the impact of contaminants on the ecological health of Kelley Brook.